

DOCKET SECTION  
BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Docket No. R97-7

POSTAL RATE AND FEE CHANGES, 1997

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
MAGAZINE PUBLISHERS OF AMERICA WITNESS GLICK  
(USPS/MPA-T4-1-9)

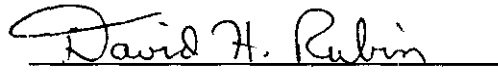
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to Magazine Publishers of America witness Glick: USPS/MPA-T4-1-9.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

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January 8, 1998

**USPS/MPA-T4-1.** Please refer to page 2 of your testimony, lines 21–23. Is your unit attributable cost estimate of 1.28 cents intended to show “the test year costs of counting, rating, and billing for the Business Reply Mail (BRM) service, above and beyond the costs already attributed to First-Class Mail?” If not, please explain.

**USPS/MPA-T4-2.** Please refer to your testimony at page 6, lines 6–7. Does your statement that the depth of sort for a barcode sorter is deeper than the depth of sort for a manual sort apply to the manual sort in the BRM operation? Please explain your answer, taking account of the fact that the manual sort in the BRM operation must finalize the BRM for delivery (so the BRM can be accounted for).

**USPS/MPA-T4-3.** Do you agree with witness Schenk’s statement that Prepaid Reply Mail (PRM) “service would be advantageous for some high-volume BRMAS-qualified BRM recipients.” USPS-T-27 at 13, lines 6–7. If not, please explain why not.

**USPS/MPA-T4-4.** Do you believe that low-volume BRMAS-qualified BRM recipients would be just as likely to switch to PRM as high-volume BRMAS-qualified BRM recipients? Please explain the basis for your answer.

**USPS/MPA-T4-5.** Do you believe that high-volume BRMAS-qualified BRM recipients are more likely to be processed using the BRMAS system than low-volume BRMAS-qualified BRM recipients? Please explain the basis for your answer.

**USPS/MPA-T4-6.** Please refer to your testimony at page 4, lines 15–24.

- (a) Do you agree with witness Schenk's assertion that "[i]f there is migration of BRMAS-qualified volumes to PRM, the BRMAS coverage factor would change . . . ." USPS-T-27 at 13, lines 7–8. If not, please explain why not.
- (b) Did witness Schenk withdraw the assertion quoted in part (a) above after responding to interrogatory MPA/USPS-T27-5c?

**USPS/MPA-T4-7.** Please refer to your testimony at page 7, lines 6 to 8.

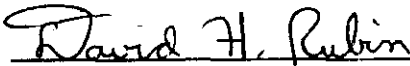
- (a) Please confirm that your use of "Base Year mail flows" includes the use of the current BRMAS coverage factor of 14.24 percent? If you do not confirm, please explain why not.
- (b) If you do confirm part (a), please confirm that your application of the base year BRMAS coverage factor to the test year assumes that only 14.24 percent of the BRMAS-qualified BRM that switches to PRM would currently be processed using the BRMAS system. If you do not confirm, please explain why not.

**USPS/MPA-T4-8.** Please confirm that the First-Class Mail that avoids carrier delivery costs (such as mail addressed to a post office box or a caller service customer) is not limited to BRMAS-qualified BRM. If you do not confirm, please explain why not.

**USPS/MPA-T4-9.** Referring to your Exhibit MPA 4-1, please confirm that the 6.33 cent weighted cost per piece does not include any delivery costs. If you do not confirm, please explain why not.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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